MACTEC

February 28, 2005

Ms. Madeleine Kellam
Department of Natural Resources
Environmental Protection Division
Brownfields Program
Suite 1154 East Tower
205 Butler Street, S.E.
Atlanta, Georgia 30334

Subject: **Compliance Status Report**
Former Westpark Plaza
Whitlock Avenue
Marietta, Cobb County, Georgia

Dear Ms. Kellam:

MACTEC Engineering and Consulting, Inc. (MACTEC) is pleased to submit this Compliance Status Report (CSR) on behalf of Cobb County, the proposed purchaser of the subject Site located on Whitlock Avenue in Marietta, Georgia (Site). This CSR summarizes the current status of soil and groundwater conditions at the subject Site.

Please contact us if further information or clarification is necessary.

Sincerely,

MACTEC ENGINEERING AND CONSULTING, INC.

Stephen R. Foley, P.G.
Senior Geologist

Charles T. Ferry, P.E.
Senior Principal Engineer

cc: Mr. Samuel Olens, Cobb County
Mr. Gerald Pouncey, Esquire

6305-J\04-206 Westpark CSR

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1.0 BACKGROUND

The subject property is located at 750 Whitlock Avenue in Marietta, Georgia and encompasses approximately 8.276 acres (see Figure 1). The Site is bounded to the west by Mountain View Road, to the south by Whitlock Avenue, to the east by commercial properties and to the north by residential properties. A legal description of the property and a Site plan has been included in the Appendices. The Site is developed with the former Westpark Plaza Shopping Center, which is currently vacant. An aerial photograph of the Site and surrounding properties is attached as Figure 2.

Cobb County has recently purchased the subject Site for redevelopment purposes. The property is planned to be redeveloped for use by Cobb County as administrative offices.

A number of previous environmental assessments have been conducted at the subject Site by Law Engineering and Environmental Services, Inc. (predecessor by merger to MACTEC) and by others between 1988 and 2004. In addition, a release notification was submitted to the Hazardous Site Response Program in May 2000 documenting soil and groundwater contamination identified in the vicinity of an on-Site dry-cleaner. The following lists the reports and correspondences on which MACTEC is partly basing this application and corrective action plan.

- Environmental Inspection Report, prepared by MDN&T, Inc. for Home Life Insurance Company, dated September 23, 1988;
- Environmental Inspection Report – Update, prepared by PCI, Inc. for Home Life Insurance Company, dated September 16, 1991;
- Phase I Environmental Assessment for the Westpark Plaza Shopping Center prepared by ATC Associates (ATC) for Chemical Bank/Chase and Phoenix Home Life Mutual Insurance Company, dated March 12, 1997;
- Phase II Site Investigation, prepared by Levine-Fricke-Recon, Inc. (LFR) for Lennar Partners, Inc., dated April 14, 1997;
- Report for Limited Phase II Environmental Site Assessment, prepared by ATC for Lennar Partners, Inc., dated April 24, 1997;
- Water Usage Survey, prepared by Law Engineering and Environmental Services, Inc. (LAW) for Morris, Manning & Martin, dated July 9, 1997;
- Report of Environmental Site Assessment, prepared by LAW for Phoenix Home Life Mutual Life Insurance Company, dated May 12, 1999;
- No Listing Determination Letter and backup memoranda, prepared by GA-EPD Hazardous Site Response Program, dated January 8, 2001.

- Report of Supplemental Soil Sampling and Testing, prepared by LAW for Phoenix Home Life Mutual Life Insurance Company; dated January 12, 2001;
- Report of Removal of Solvent Contaminated Soil, prepared by LAW for United Retail Development Company, LLC, dated August 31, 2001; and
- Corrective Action Plan, prepared by MACTEC Engineering and Consulting, Inc., dated October 25, 2004.

Based on MACTEC's review of the aforementioned documents, we note the following:

- Previous historical research indicates the site consisted of residential or agricultural property until 1980 when the Westpark Plaza Shopping Center was constructed. The tenant space in the westernmost portion of the building was occupied by a dry cleaner from 1980 until approximately 2001. The cleaners operated dry cleaning equipment, except for a short time prior to closure in 2001 when it was a pick-up/drop-off facility.
- Initial subsurface testing conducted in 1997 identified chlorinated solvents in the soil and groundwater in the immediate vicinity of the on-Site dry cleaner. Maximum concentrations detected in soil were 51,800 ug/kg of tetrachloroethene (PCE) and 846 ug/kg of trichloroethene (TCE). One groundwater sample was collected from the area immediately southeast of the dry cleaner. PCE and TCE were detected in groundwater at concentrations of 320 ug/l and 90 ug/l, respectively.
- Subsequent testing conducted by LAW in May 1999 identified elevated concentrations of a number of chlorinated compounds in soil beneath the dry cleaner tenant space. Maximum concentrations detected in soil were 8,900 ug/kg of PCE, 670 ug/kg of TCE and 840 ug/kg of dichloroethene (DCE). Lower concentrations of other chlorinated compounds, including dichloroethane, chlorobenzene and chloroform were also detected. Only PCE, TCE and DCE were detected in soil in excess of their respective HSRA notification concentrations. Groundwater testing identified PCE, TCE and DCE in one well located immediately south of the dry cleaner at concentrations higher than those previously detected on Site (10,000 ug/l of PCE, 1,600 ug/l of TCE and 430 ug/l of DCE). Chlorinated compounds were not detected in two other wells located near Whitlock Avenue in the southern portion of the Site.

- In May 2000, a HSRA notification package was submitted to the GA-EPD by Mr. David Stewart of S&S Dry Cleaning. The Site was determined by GA-EPD to have a RQSM groundwater pathway score of 0.81. Because the reported soil contamination was located beneath the former building, the Site was deemed to be of limited accessibility. As a result, the on-Site pathway score calculated for the Site by GA-EPD was 18.52.

- The Georgia EPD Hazardous Site Response Program issued a letter dated January 8, 2001 in which they indicated, "EPD has no reason to believe that a release exceeding a reportable quantity has occurred at this site. Therefore, this site will not be listed in the Hazardous Site Inventory."

- The property was under consideration for purchase by United Retail Development Company (United) in late 2000. Prior to its acquisition, supplemental soil testing was conducted by LAW in December 2000 and January 2001 to delineate the extent of contamination above HSRA notification concentrations. The testing results indicated that the bulk of the soil contamination was located underneath the western portion of the building, in the area beneath the dry cleaner and the adjacent tenant space to the east.

- In July 2001, immediately following the acquisition of the property by United, a portion of the building, including the dry cleaner space and four tenant spaces to the east, was demolished. MACTEC then monitored the excavation and removal of solvent-contaminated soils down to the water table/capillary fringe. A total of 1084 tons of impacted soils were transported off-Site and properly disposed. Confirmation sampling conducted following the excavation did not identify remaining soils exceeding HSRA notification concentrations.

- Prior to acquisition of the property by Cobb County, MACTEC conducted additional sampling near the former dry cleaners and submitted a Brownfield Corrective Action Plan (CAP) dated October 25, 2004 on behalf of Cobb County. The CAP was approved by EPD on October 29, 2004.

- Based on an updated groundwater usage survey, following the closure of one well approximately 2.5 miles from the Site in 2004, there are no active drinking water wells within three miles of the Site.

- Following approval of the CAP, Cobb County acquired the property on November 5, 2004, and MACTEC proceeded to implement the CAP, including removal of 839 additional tons of impacted soil in those areas that were found to exceed the HSRA Type I risk reduction standards.

2.0 PURPOSE

The purpose of this CSR is to document the current status of the Site with regard to the Hazardous Site Reuse and Redevelopment Act for all regulated substances associated with the release at the property. This CSR was compiled on the basis of property conditions which were characterized through a series of investigations and remedial activities performed at the Site by MACTEC Engineering and Consulting, Inc. between September and December 2004.

3.0 DESCRIPTION OF THE RELEASE SOURCE

Results of soil and groundwater assessment activities indicate a release of regulated substances in soil and groundwater. This section of the CSR provides a description of the source of the release.

3.1 SOURCE OF RELEASE

Information obtained to date and documented in subsequent sections of this report indicate the source of the release identified at the Site was three dry cleaners, West Cobb Cleaners, One Hour Martinizing and S&S Dry Cleaning, which consecutively operated in the former tenant space located in the western portion of the shopping center between approximately 1980 and 2001. A HSRA notification for a release to soil and groundwater was submitted by Mr. David Stewart of S&S Dry Cleaning for the Site in May 2000. In January 2001, the GA-EPD issued a "no listing" letter for the Site.

3.2 REGULATED SUBSTANCE RELEASED FROM THE SOURCE

The regulated substances identified in groundwater at the Site include: tetrachloroethene, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, 1,1-dichloroethene, diethyl phthalate, chloroform and vinyl chloride. The chlorinated compounds are generally believed to be related to a previous release or releases from the former on-Site dry cleaners. The chloroform is believed to be related to known leakage from the building's water supply line. The source of the diethyl phthalate is not known at this time.

The regulated substances identified in soil at the Site include: tetrachloroethene, trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, 1,1,dichloroethene and acetone. Again, the chlorinated compounds are also believed to be related to previous releases from the former dry cleaners. The acetone is believed to be a false positive resulting from interaction between the soil and sample preservative.

3.3 CHRONOLOGY OF THE RELEASE

Specific information regarding the chronology of the release is not available. The former dry cleaners are no longer in operation. Research indicates that on-Site dry cleaning occurred from 1980 to 2000. S&S Dry Cleaning continued operation as a pick-up/drop-off location until 2001. The portion of the building which formerly housed the dry cleaner was demolished in July 2001.

3.4 DESCRIPTION OF THE SOURCE

Based on the information obtained during the assessments of the Site, the solvent impacted groundwater identified on Site appears to be related to the former on-Site dry cleaning operations. Other suspected source areas were not identified via evidence of chemical handling, observed staining or soil and groundwater testing results.

The volatile organic compounds acetone, cis-1,2-dichloroethene, trans-1,2-dichloroethene, tetrachloroethene and trichloroethene were identified in a several of the soil samples collected from the vicinity of the former excavation area. In five of the borings located adjacent to the former excavation, VOC constituents were detected at concentrations above HSRA Type I Risk Reduction Standards (RRS) and notification concentrations. Although low levels of several VOCs were detected in several borings in the area farther north of the former excavation, these constituents were not detected above their respective Type I RRS or notification concentrations. No SVOCs were detected in the soil samples tested. Acetone was detected in five of the samples tested. This constituent had not previously been detected on Site. Laboratory representatives indicated that no evidence of laboratory induced contamination was evident and that the acetone detected is likely an artifact of the sample preservation method as sodium bisulfate has been shown to react with certain soils to produce acetone. Regardless, acetone was not detected above its Type I RRS or notification concentration.

The soil testing results obtained indicated that soils existed around the perimeter of the former excavation which exceeded the HSRA Type I RRS and notification concentrations for one or more constituents. Based on this information, in November 2004, MACTEC conducted additional soil excavation activities around the perimeter of the original excavation, as dictated by those samples which exceeded the HSRA Type I RRS and notification concentrations. As illustrated on Figure 5, the excavation proceeded in three areas based on the September 2004 soil testing data. Following completion of the planned excavation, confirmation samples were collected from the sidewalls of each excavation area. The results of the confirmation testing are summarized below in Table 2 and on Figure 5.

Table 2 – Soil Testing Results – Confirmation Samples, November 2004

Constituent, mg/kg	A1-1 5'	A1-2 5'	A1-5 5'	A2-1 4-5'	A2-3 4-5'	A2-5 4-5'	HSRA Notification Concentration	Type I Risk Reduction Standards
Acetone	<0.063	<0.054	<0.58	<0.054	<0.050	<0.054	2.74	400
Tetrachloroethene	**0.730**	0.008	<0.003	**0.560**	**0.210**	0.061	0.18	0.5
Trichloroethene	**0.220**	0.018	<0.003	**0.760**	**0.150**	**0.200**	0.13	0.5
Cis-1,2-dichloroethene	0.280	0.019	<0.003	**3.0**	0.260	0.032	0.53	0.53
Trans-1,2-dichloroethene	<0.003	<0.003	<0.003	0.160	0.013	0.021	0.53	10
1,1-dichloroethene	<0.003	<0.003	<0.003	0.0048	<0.003	0.004	0.36	0.7
Vinyl chloride	<0.003	<0.003	<0.003	<0.003	<0.003	<0.003	0.04	0.2

mg/kg - milligrams per kilogram (parts per million)
A bold number indicates exceedence of Type I RRS or Notification Concentration

Table 2 – Soil Testing Results - Confirmation Samples, November 2004 (continued)

Constituent, mg/kg	A2-7 4-5'	A3-1 4-5'	A3-3 4-5'	A3-5 4-5'	A3-7 4-5'	HSRA Notification Concentration	Type I Risk Reduction Standards
Acetone	<0.058	<0.056	<0.056	<0.066	<0.072	2.74	400
Tetrachloroethene	0.110	0.051	**0.310**	0.041	0.090	0.18	0.5
Trichloroethene	0.071	0.006	0.007	<0.003	0.004	0.13	0.5
Cis-1,2-dichloroethene	0.037	<0.003	<0.003	<0.003	<0.004	0.53	0.53
Trans-1,2-dichloroethene	<0.003	<0.003	<0.003	<0.003	<0.004	0.53	10
1,1-dichloroethene	<0.003	<0.003	<0.003	<0.003	<0.004	0.36	0.7
Vinyl chloride	<0.003	<0.003	<0.003	<0.003	<0.003	0.04	0.2

mg/kg - milligrams per kilogram (parts per million)
A bold number indicates exceedence of Type I RRS or Notification Concentration

The results of the confirmation sampling conducted following the soil excavation indicated that concentrations of several constituents still exceeded HSRA Type I RRS and/or notification concentrations in several areas of the excavation. Based on this data, the excavation was expanded and additional confirmation samples were collected. The results of the second round of confirmation sampling area summarized below in Table 3 and on Figure 5.

Table 3 – Soil Testing Results - Confirmation Samples, December 2004

Constituent, mg/kg	A1-7 5'	A2-9 5'	A2-11 5'	A2-13 5'	A3-9 5'	A3-11 5'	HSRA Notification Concentration	Type I Risk Reduction Standards
Acetone	<0.052	<0.057	<0.054	<0.050	<0.060	<0.061	2.74	400
Tetrachloroethene	<0.003	0.006	0.006	0.058	<0.003	0.005	0.18	0.5
Trichloroethene	<0.003	0.015	0.032	0.120	<0.003	<0.003	0.13	0.5
Cis-1,2-dichloroethene	0.052	0.110	0.026	0.027	<0.003	<0.003	0.53	0.53
Trans-1,2-dichloroethene	<0.003	0.008	0.009	0.015	<0.003	<0.003	0.53	10
1,1-dichloroethene	<0.003	<0.003	<0.003	0.004	<0.003	<0.003	0.36	0.7
Vinyl chloride	<0.003	<0.003	<0.003	0.005	<0.003	<0.003	0.04	0.2

mg/kg - milligrams per kilogram (parts per million)

Excavation activities were completed on December 1, 2004 and the excavation was backfilled with compacted soil. As noted above, all impacted soils were removed to below HSRA Type I RRS. A total of approximately 839 tons of soil were removed and transported to Eagle Point landfill in Ballground, Georgia for disposal (see Appendix E for copies of disposal manifests).

4.4 BACKGROUND SOIL CONCENTRATIONS

Because the suspected VOC and SVOC compounds in soil are not characteristic of naturally occurring conditions in Piedmont soils, naturally occurring background conditions on the affected property were assumed to be below laboratory detection limits.

5.6 BACKGROUND GROUNDWATER QUALITY

Because the VOCs and SVOCs in question are not typical of naturally occurring substances in the Piedmont, naturally occurring background conditions for these constituents at the subject property were assumed to be below laboratory detection limits.

5.7 SUMMARY OF GROUNDWATER TESTING RESULTS

The groundwater testing results are summarized below in Table 5 and on Figure 6.

Table 5 – Groundwater Testing Results, September/October 2004

Constituent	MW-1	MW-2	MW-4	GW-1	GW-2	GW-3	GW-4	GW-5	GW-6	GW-6 (Retest)	MCL
VOCs, ug/l											
Chloroform	<5.0	<5.0	9.0	<5.0	24	<5.0	<5.0	<5.0	13	<5.0	NE
Cis-1,2-Dichloroethene	<5.0	<5.0	<5.0	<5.0	60	<5.0	<5.0	<5.0	1,900	3,700	70
Trans-1,2-Dichloroethene	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	40	25	100
1,1-Dichloroethene	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	<5.0	5.3	7.0
Tetrachloroethene	<5.0	<5.0	170	<5.0	1,200	<5.0	<5.0	<5.0	4,300	6,100	5.0
Trichloroethene	<5.0	<5.0	<5.0	<5.0	190	<5.0	<5.0	<5.0	2,300	2,700	5.0
Vinyl Chloride	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	<2.0	5.0	3.7	2.0
SVOCs, ug/l											
Diethyl phthalate	<10	<10	NT	<10	<10	<10	NT	14	12	NT	NE

ug/l - micrograms per liter (parts per billion)
MCL - Maximum Contaminant Level for Drinking Water
NE - Not established
NT - Not tested

A number of chlorinated VOCs were detected in three wells located in the immediate vicinity of the former dry cleaner, most of which are related to dry cleaning compounds or their breakdown products. The concentrations detected in the shallow wells GW-2 and GW-6, were significantly higher than those detected in MW-4, a deep well located immediately south of the former dry cleaner. Chloroform was detected in two wells at low concentrations. Chloroform is a residual constituent in the treatment of municipal water supplies and is commonly detected in areas exhibiting leakage from potable water lines or sewer lines. The former dry cleaner is known to have previously had a leaking water line. Diethyl phthalate was also detected at low concentrations in two wells. No obvious source of this compound has not been determined.

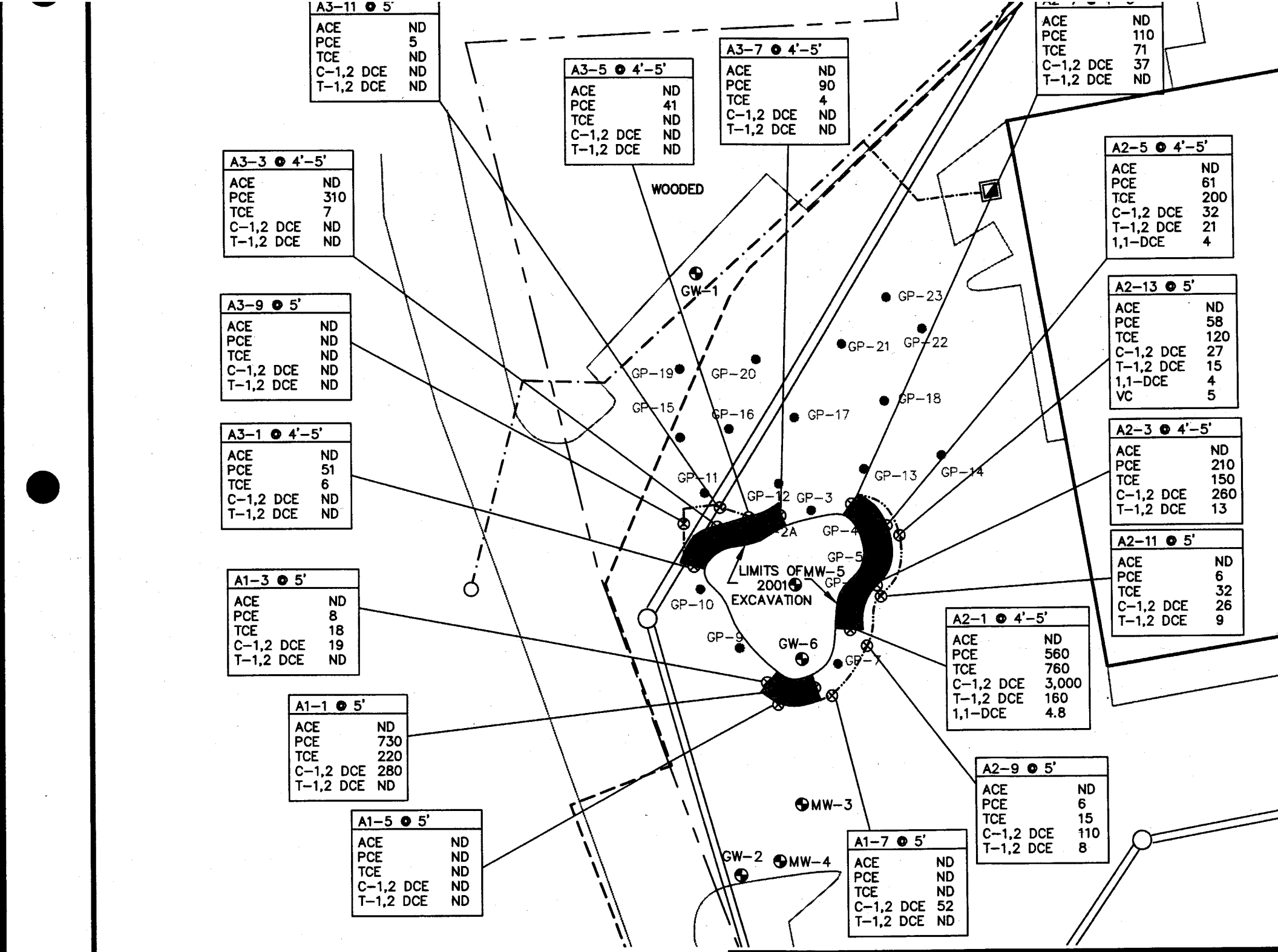
Based on the findings of the groundwater sampling, it is evident that a groundwater contaminant plume emanates from the area of the former on-Site dry cleaner. The plume extends beyond the western boundary of the subject Site. The plume has been delineated within the Site boundaries in the area south of the former dry cleaner.

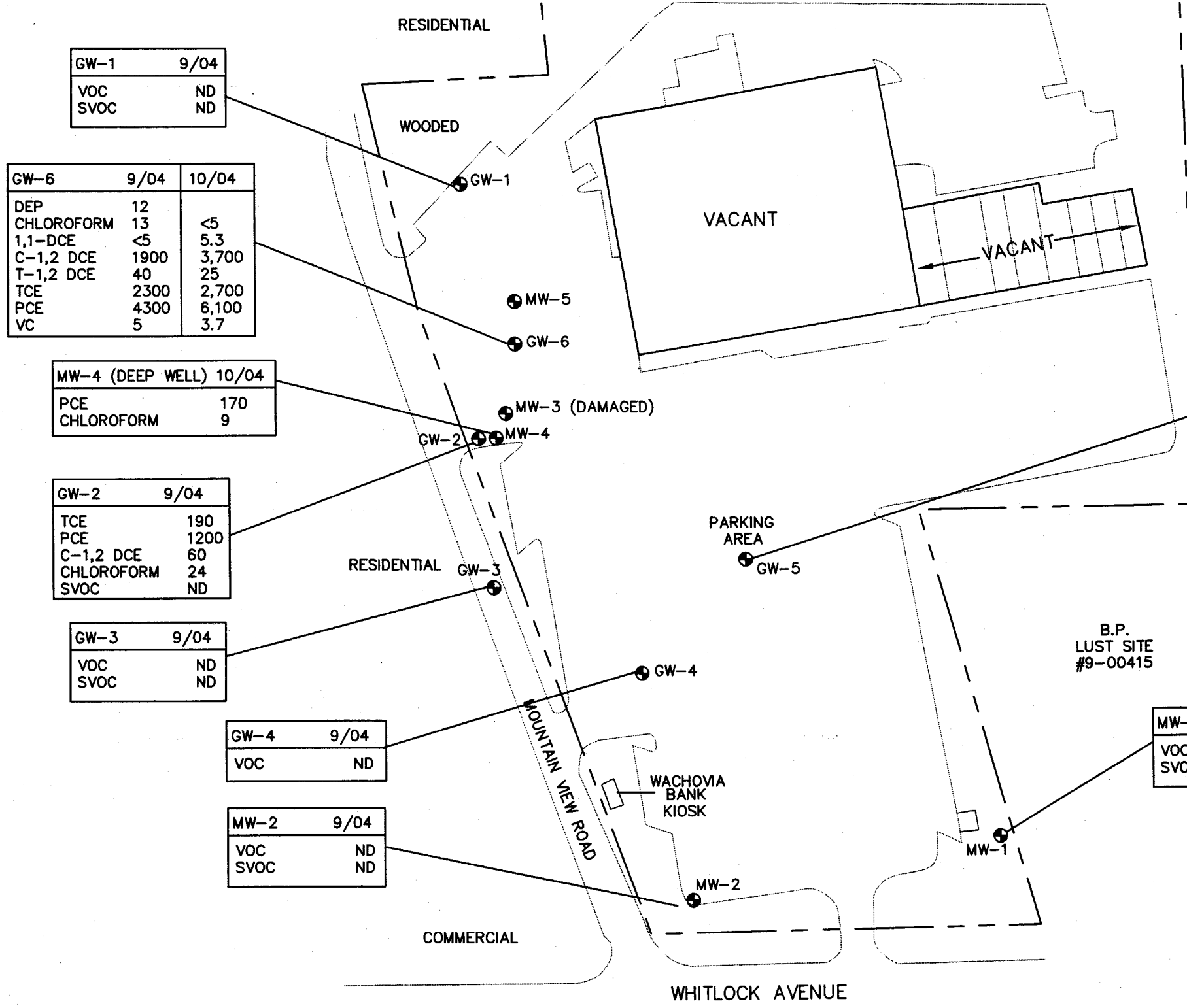
Three HSRA-regulated constituents were detected in soil above HSRA notification concentrations during MACTEC's September 2004 assessment. Soil verification testing conducted following the remedial activities conducted in November and December 2004 indicated that these constituents were no longer above their respective notification concentrations. Type 1 RRS for all constituents detected in soil on Site are presented below in Table 6 along with the highest concentration of each constituent detected in the post remediation verification testing. Based on the data obtained, the Site satisfies Type 1 RRS calculated for potential exposure to soil.

Table 6 - Risk Reduction Standards for Soil

Regulated Substance	Highest Concentration (post remediation) mg/kg	Location	Type 1 RRS Criteria mg/kg
Acetone	<0.70	--	400
1,1-dichloroethene	0.004	A2-13	0.70
Cis-1,2-dichloroethene	0.110	A2-9	0.53
Trans-1,2-dichloroethene	0.015	A2-13	10.0
Tetrachloroethene	0.058	A2-13	0.50
Trichloroethene	0.120	A2-13	0.50
Vinyl chloride	0.005	A2-13	0.20

ug/kg - micrograms per kilogram


A3-11 ⊙ 5'
ACE ND
PCE 5
TCE ND
C-1,2 DCE ND
T-1,2 DCE ND
A3-5 ⊙ 4'-5'
ACE ND
PCE 41
TCE ND
C-1,2 DCE ND
T-1,2 DCE ND
A3-7 ⊙ 4'-5'
ACE ND
PCE 90
TCE 4
C-1,2 DCE ND
T-1,2 DCE ND
ACE ND
PCE 110
TCE 71
C-1,2 DCE 37
T-1,2 DCE ND
A3-3 ⊙ 4'-5'
ACE ND
PCE 310
TCE 7
C-1,2 DCE ND
T-1,2 DCE ND
WOODED
A2-5 ⊙ 4'-5'
ACE ND
PCE 61
TCE 200
C-1,2 DCE 32
T-1,2 DCE 21
1,1-DCE 4
GW-1
A3-9 ⊙ 5'
ACE ND
PCE ND
TCE ND
C-1,2 DCE ND
T-1,2 DCE ND
GP-23
GP-21
GP-22
GP-19
GP-20
GP-18
GP-15
GP-16
GP-17
A2-13 ⊙ 5'
ACE ND
PCE 58
TCE 120
C-1,2 DCE 27
T-1,2 DCE 15
1,1-DCE 4
VC 5
A3-1 ⊙ 4'-5'
ACE ND
PCE 51
TCE 6
C-1,2 DCE ND
T-1,2 DCE ND
GP-11
GP-12
GP-3
GP-13
GP-14
2A
GP-4
GP-5
A2-3 ⊙ 4'-5'
ACE ND
PCE 210
TCE 150
C-1,2 DCE 260
T-1,2 DCE 13
LIMITS OF MW-5
2001
EXCAVATION
GP-10
A2-11 ⊙ 5'
ACE ND
PCE 6
TCE 32
C-1,2 DCE 26
T-1,2 DCE 9
A1-3 ⊙ 5'
ACE ND
PCE 8
TCE 18
C-1,2 DCE 19
T-1,2 DCE ND
A2-1 ⊙ 4'-5'
ACE ND
PCE 560
TCE 760
C-1,2 DCE 3,000
T-1,2 DCE 160
1,1-DCE 4.8
GP-9
GW-6
GP-7
A1-1 ⊙ 5'
ACE ND
PCE 730
TCE 220
C-1,2 DCE 280
T-1,2 DCE ND
A2-9 ⊙ 5'
ACE ND
PCE 6
TCE 15
C-1,2 DCE 110
T-1,2 DCE 8
MW-3
A1-5 ⊙ 5'
ACE ND
PCE ND
TCE ND
C-1,2 DCE ND
T-1,2 DCE ND
A1-7 ⊙ 5'
ACE ND
PCE ND
TCE ND
C-1,2 DCE 52
T-1,2 DCE ND
GW-2
MW-4
MACTEC Engineering and Consulting, Inc.



GW-1	9/04
VOC	ND
SVOC	ND

GW-6	9/04	10/04
DEP	12	
CHLOROFORM	13	<5
1,1-DCE	<5	5.3
C-1,2 DCE	1900	3,700
T-1,2 DCE	40	25
TCE	2300	2,700
PCE	4300	6,100
VC	5	3.7

MW-4 (DEEP WELL)	10/04
PCE	170
CHLOROFORM	9

GW-2	9/04
TCE	190
PCE	1200
C-1,2 DCE	60
CHLOROFORM	24
SVOC	ND

GW-3	9/04
VOC	ND
SVOC	ND

GW-4	9/04
VOC	ND

MW-2	9/04
VOC	ND
SVOC	ND

MW-
VOC
SVC

MACTEC Engineering and Consulting, Inc.